

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Uniloc 2017 LLC

Plaintiff

V.

Apple Inc.,

Defendant

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Case No. 6:19-cv-532

PATENT CASE

Jury Trial Demanded

**AGREED MOTION TO EXTEND TIME TO FILE RESPONSE AND REPLY BRIEFS
RELATING TO DEFENDANT APPLE INC.'S MOTION TO TRANSFER VENUE**

Plaintiff Uniloc 2017 LLC (“Uniloc”) and defendant Apple Inc. (“Apple”) respectfully move the Court for an order extending the time for Uniloc to file its brief in response to Apple’s Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (Dkt. No. 15) and extending the time for Apple to file its reply brief. Uniloc’s current deadline to file its response brief is December 20, 2019.

To fully address the issues arising from Apple's Motion to Transfer Venue, both parties seek to conduct certain venue-related discovery, primarily Rule 30(b)(6) depositions as to venue-related issues and are having on-going discussions about the number and scope of such depositions before they formally seek leave from this Court to conduct such discovery. The parties have thus far agreed, subject to obtaining formal leave from this Court, that 1) Apple will conduct a Rule 30(b)(6) deposition of Uniloc on January 14, 2020 concerning certain venue-related deposition topics, subject to Uniloc's objections; and 2) Uniloc will conduct a Rule 30(b)(6) deposition of Apple on January 24, 2020 concerning certain venue-related deposition topics, subject to Apple's objections. The parties are, however, still negotiating the extent to which Apple will provide

testimony as to other certain Uniloc-requested deposition topics. Apple's investigation relating to those deposition topics is ongoing, but it expects to report back to Uniloc in early January 2020 so that the parties can conclude their negotiations and formally seek leave of court to conduct the venue discovery in early or mid-January. Accordingly, the parties seek to extend the deadline for Uniloc's response brief to and including February 7, 2020.

The extension is requested to allow for the parties to continue their negotiations concerning the venue discovery that they seek. To the extent that the parties reach agreement as to certain venue discovery that they wish to conduct, they will jointly seek leave from the Court to do so. And to the extent that there are remaining disputed issues, the parties anticipate seeking the Court's guidance as needed. The parties seek this extension not for delay but for good cause and that justice may be served. Uniloc agrees that it will not use this extension or the fact that case activity has occurred during this process as a basis to resist transfer.

Wherefore, Uniloc and Apple respectfully request that the Court order that the date by which Uniloc must respond to Apple's Motion to Transfer be extended to and including February 7, 2020.

DATED: December 19, 2020

Respectfully Submitted,

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**ATTORNEYS FOR DEFENDANT
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] – Document Filing System, to all counsel of record,

/s/ William E. Davis, III

William E. Davis, III